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**RECEIVED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

DEC 03 2007 *aw*  
DEC 03 2007  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

*PAUL JARNELL TAYLOR*

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

07CV6799  
JUDGE DER-YEGHAIYAN  
MAGISTRATE JUDGE COLE

vs.

Case No: \_\_\_\_\_  
(To be supplied by the Clerk of this Court)

*MR. SUPERINTENDENT SNOOKS,  
SUPERINTENDENT MCGUIRE,  
SUPERINTENDENT PLEXICO,  
SUPERINTENDENT ANDREW,  
SUPERINTENDENT SALAZAR,  
SUPERINTENDENT BROWN,*

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

*JURY DEMAND:*

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

**I. Plaintiff(s):**

A. Name: PAUL JARNELL TAYLOR #2006-0080893  
 B. Date of Birth: SEPTEMBER 8th 1965 9/8/65  
 C. List all aliases: NONE  
 D. Prisoner identification number: 2006-0080893  
 E. Place of present confinement: CHICAGO, COOK COUNTY JAIL  
 F. Address: P.O. BOX. 089002 CHICAGO, ILL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, date of birth, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

1) A. Defendant: MR. AGUIRE;  
 Title: SUPERINTENDENT / DIVISION  
 Place of Employment: COOK COUNTY SHERIFF

2) B. Defendant: MR. SNOOK;  
 Title: SUPERINTENDENT / DIVISION  
 Place of Employment: COOK COUNTY JAIL

3) C. Defendant: MR. BROWN  
 Title: SUPERINTENDENT / DIVISION  
 Place of Employment: COOK COUNTY JAIL

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

## PLAINTIFF(S) : Vs. DEFENDANT(S) :

PAUL JARNELL TAYLOR; (PRO-SE)  
 #2006-0080893  
 P.O. Box 089002  
 CHICAGO, ILL 60608

- 4) I. DEFENDANT(S): SALAZAR;  
 TITLE: SUPERINTENDANT / DIVISION VIII  
 PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 5) E. DEFENDANT(S): ANDREW;  
 TITLE: SUPERINTENDANT / DIVISION  
 PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 6) F. DEFENDANT(S): MR. PLEXICO; II  
 TITLE: SUPERINTENDANT / DIVISION  
 PLACE OF EMPLOYMENT COOK COUNTY JAIL
- 7) G. DEFENDANT(S): MR. FRANCO;  
 TITLE: CAPTIAN / DIVISION  
 COOK COUNTY JAIL; PLACE OF EMPLOYMENT
- 8) H. DEFENDANT(S) UNKNOWN; MRS. CIVILIAN;  
 TITLE: OFFICER / DIVISION XI  
 PLACE OF EMPLOYMENT COOK COUNTY JAIL

## PLAINTIFF(S); Vs. DEFENDANT(S):

- 9.) I. DEFENDANT(S): MR. UNKNOWN;  
TITLE: SHERIFF; OFFICER / DIVISION XI  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 10.) J. DEFENDANT(S): MR. UNKNOWN;  
TITLE: SHERIFF; OFFICER / DIVISION XI  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 11.) K. DEFENDANT(S): MR. UNKNOWN;  
TITLE: SHERIFF; OFFICER / DIVISION IX  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 12.) L. DEFENDANT(S): MR. UNKNOWN;  
TITLE: SHERIFF; OFFICER / DIVISION  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 13.) M. DEFENDANT(S): MR. UNKNOWN;  
TITLE: SHERIFF; OFFICER / DIVISION  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL
- 14.) N. DEFENDANT(S): MRS. UNKNOWN  
TITLE: NURS; DIVISION II RECEIVING  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL

## PLAINTIFF(S); Vs. DEFENDANT(S):

- 15) O. DEFENDANT(S): MRS. UNKNOWN;  
TITLE: DIVISION ~~XI~~  
PLACE OF EMPLOYMENT COOK COUNTY JAIL.
- 16) P. DEFENDANT(S): MR. TRIVIENO  
TITLE: OFFICER; DIVISION  
PLACE OF EMPLOYMENT COOK COUNTY JAIL.
- 17) Q. DEFENDANT(S): MR. UNKNOWN  
TITLE: OFFICER; SHERIFF  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL.
- 18) R. DEFENDANT(S): MR. GREENE  
TITLE: SHERIFF; OFFICER SEREAGENT. DIVISION ~~IX~~  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL.
- 19) S. DEFENDANT(S): MR. PLUNKETT;  
TITLE: SOCIAL WORKER; DIVISION ~~XI~~  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL.
- 20) T. DEFENDANT(S): MR. MARTINEZ;  
TITLE: SOCIAL WORKER; DIVISION ~~X~~  
PLACE OF EMPLOYMENT: COOK COUNTY JAIL.

21) DEPRIVATION OF THE UNITED STATES CONSTITUTION  
TO THE UNITED STATES CONSTITUTION OF AMERICA (1st.)

22) FIRST AMENDMENT CONSTITUTIONAL RIGHTS:  
THE DEFENDANT(S) AGUIRE; SNOOKS; MRS; UNKNOWN;  
MRS; UNKNOWN; MRS; UNKNOWN; MRS; UNKNOWN;  
MR; UNKNOWN; ALL DEPRIVED THE PLAINTIFF OF ANY  
CHANCE TO APPEAL HIS DISCIPLINARY INFRACTION(S).

23) THERE IS A APPEALING PROCESS AT THE CHICAGO COOK COUNTY  
JAIL, HOWEVER; NO DISCIPLINARY COMMITTEE CHAIRPERSON,  
ANY OR MEMBER WOULD ACCEPT PLAINTIFF(S) APPEAL, AGAINST  
POLICY, RULES, REGULATIONS & DISCIPLINARY PROCESS.

24) DEFENDANT(S): (U.) MRS; UNKNOWN; IS THE OF THE  
COOK COUNTY JAIL DIVISION IX ADMINISTRATION HEARING OFFICER,  
(D.H.O) SHE REFUSED TO GIVE PLAINTIFF ANY APPEAL FORMS TO APPEAL,  
HIS DISCIPLINARY REPORT GUILTY VERDICT.

25) DEFENDANT(S): (V.) MRS; UNKNOWN; IS A DISCIPLINARY HEARING  
MEMBER; FOR DIVISION IX SHE IS A SHERIFF OFFICER, SHE ALSO  
FAILURE TO GIVE PLAINTIFF AN APPEAL FORM TO APPEAL HIS  
GUILTY VERDICT.

26) DEFENDANT(S): (W.) MRS; UNKNOWN; IS THE DISCIPLINARY HEARING  
OFFICER; ON THE DISCIPLINARY COMMITTEE SHE FAILURE TO GIVE THE  
PLAINTIFF, AN APPEAL FORM TO APPEAL HIS DISCIPLINARY GUILTY  
VERDICT.

27) DEFENDANT(S): (X.) MRS; UNKNOWN; IS A SGT; FOR THE COOK COUNTY  
JAIL, DISCIPLINARY COMMITTEE SHE FAILURE TO GIVE PLAINTIFF AN APPEAL  
FORM AFTER A GUILTY VERDICT FROM A DISCIPLINARY REPORT.

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: CV-07-C-5097
- B. Approximate date of filing lawsuit: SEPTEMBER 14th 2007
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: (ONE) 1  
DAVID TAYLOR 2006-0080893
- D. List all defendants: CITICORP POLICE DEPARTMENT et al;  
DEFENDANTS: BELL, JOHNSON, HADELEKA;
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): UNITED STATES DISTRICT COURT
- F. Name of judge to whom case was assigned: MAGISTRATE JUDGE  
MILTON I. SHAFER.
- G. Basic claim made: VIOLATION OF FOURTH AMENDMENT &  
5th AMENDMENT CONSTITUTION TO THE UNITED STATES  
CONSTITUTION OF AMERICAN.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): YES. THE CASE IS NOW SET  
FOR STATUS HEARING
- I. Approximate date of disposition: NONE

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.



## DEFENDANTS):

28.) DEFENDANTS: (Y.) MRS; UNKNOWN IS A CIVILIAN ON THE DISCIPLINARY COMMITTEE. SHE FAILURE TO GIVE THE PLAINTIFF, AN APPEAL FORM TO APPEAL HIS ~~DECISION~~ DISCIPLINARY GUILTY VERDICT.

29.) DEFENDANTS: (O.) MRS; UNKNOWN; IS A SERGEANT ON THE DISCIPLINARY HEARING COMMITTEE. SHE FAILURE TO GIVE THE PLAINTIFF AN APPEAL FORM TO APPEAL HIS GUILTY VERDICT.

30.) DEFENDANTS: (I.) MR; UNKNOWN; IS A ~~CIVILIAN~~ FOR THE DISCIPLINARY HEARING COMMITTEE HE FAILURE TO GIVE PLAINTIFF AN APPEAL FORM TO APPEAL HIS GUILTY VERDICT BY DISCIPLINARY REPORT.

31.) DEFENDANTS: (A.) MR; AGUIRE; IS THE SUPERINTENDENT AT DIVISION HE FAILURE TO PROVIDE APPEAL FORM/SYSTEM FOR PLAINTIFF AND REFUSED TO HEAR PLAINTIFF APPEAL ON REGULAR PAPER.

32.) DEFENDANTS: (B.) MR; SNOOK; IS THE SUPERINTENDENT AT DIVISION ~~IX~~ HE REFUSED TO PROVIDE FORMS/SYSTEM FOR PLAINTIFF AND REFUSED TO HEAR PLAINTIFF APPEAL ON REGULAR PAPER.

33.) ALL THE ABOVE DEFENDANTS PARTICIPATED IN WITFULLY DEPRIVING PLAINTIFF HIS FIRST AMENDMENT CONSTITUTIONAL RIGHTS FAILURE TO ASSIST PLAINTIFF HIS RIGHT TO (REPRESS A WRONG) BY THE (1ST) AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION TO THE UNITED STATE CONSTITUTION OF AMERICA. CLAIM STATED.



## DUE PROCESS CLAUSE CLAIMS

- 34) DEFENDANT(S): TEJESS; KICKED, REPEATEDLY PLAINTIFF, IN HIS HEAD, WHILE HE WAS ON THE GROUND, HANI CUFFED BEHIND HIS BACK.
- 35) DEFENDANT(S): (Z.) UNKNOWN PUNCHED, REPEATEDLY PLAINTIFF, WHILE HANI CUFFED, IN HIS CELL.
- 36) DEFENDANT(S): (R.) BREENE; REPEATEDLY SLAPPED; PUNCHED; PLAINTIFF, IN HIS MOUTH AND FACE, WHILE HANI CUFFED, BEHIND HIS BACK.
- 37) DEFENDANT(S): TRIVINO; CHOKED, PLAINTIFF BUSTING A BOILED SESSE, PLACED PLAINTIFF, IN A DIVISION XI HOLDING CELL INSTEAD OF MEDICAL CLINIC/HOSPITAL. PLAINTIFF, WAS (REFUSED) MEDICAL TREATMENT) WHILE BLEEDING FROM HIS NECK; FOR HOURS DEFENDANT DID NOT CARE!!!
- 38) THAT; ALL DEFENDANTS DID BREACH THEIR DUTIES TO PREVENT THE PLAINTIFF FROM HIS INJURIES, AND THE BELOW DEFENDANTS AGUIRE; SNOOKS; KNEW OF THE DEFENDANT'S PRIOR EVENTS, AND ACTIVITIES. DEFENDANTS AGUIRE; SNOOKS (FAILURE TO PROTECT) THE PLAINTIFF, FROM HIS INJURIES. PLAINTIFF SUFFERED CONCUSSION, AND BUSTED MOUTH, CAUSED BY THE DEFENDANTS AND (REFUSED) MEDICAL TREATMENT) EVEN SHOWING BUSTED THROAT, WAS BLEEDING. CONSTITUTES A VIOLATION OF MR. DALE J. TAYLOR'S (FOURTEENTH) & 14th DUE PROCESS CLAUSE RIGHTS BY THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

# PLAINTIFF VS. DEFENDANT(S)

39.) DEFENDANT SERGEANT ROBINSON;  
TITLE: SERGEANT AT DIVISION IX  
SHERIFF AT CHICAGO COOK COUNTY JAIL

40.) DEFENDANT ROBINSON: PLACED PLAINTIFF IN PUNITIVE SEGREGATION FOR NO REASON AT ALL. THE DEFENDANT ROBINSON NEVER ISSUED A DISCIPLINARY REPORT (D.R.) TO THE PLAINTIFF AND/OR ANY DUE NOTICE OF INVESTIGATION. THIS CONSTITUTES A VIOLATION OF MR. PAUL JARNELL TAYLOR'S, DUE PROCESS RIGHT BY THE DUE PROCESS CLAUSE: BY THE 14th AMENDMENT CONSTITUTIONAL RIGHTS TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

41.) DEFENDANT (B): MR. SNOOKS; WAS THE SUPERINTENDANT AT THE CHICAGO COOK COUNTY JAIL DIVISION IX HE HAS THE OVERALL AUTHORITY TO CORRECT THE CONSTITUTIONAL VIOLATION. HOWEVER, DEFENDANT SNOOKS; FAILURE TO CORRECT DEFENDANT ROBINSON, CONSTITUTIONAL DUE PROCESS CLAUSE BY THE 14th AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

42.) INJURIES; DEPRIVED DUE PROCESS; PERSONAL PROPERTY; LIBERTY INTEREST; PSYCHOLOGICAL ABUSE; PRIVATE PRIVILEGES.

## PLAINTIFF Vs. DEFENDANT(S):

## DUE PROCESS CLAUSE CLAIMS:

43.) THAT DEFENDANT(S); MR. UNKNOWN; IS A CIVILIAN; (H.) IS MRS. CIVILIAN; UNKNOWN; MRS. UNKNOWN SERGEANT; MRS. - UNKNOWN SERGEANT; MRS. LIEUTENANT. UNKNOWN; MR. SCOTT. OFFICER; AND MRS. UNKNOWN; OFFICER. ALL WAS ON THE DISCIPLINARY ADMINISTRATIVE HEARING AT DIFFERENT TIMES. HOWEVER, THEY ALL FOUND PLAINTIFF GUILTY KNOWING THAT THE DISCIPLINARY REPORT (WAS NOT) IN COMPLIANCE BY STATE, DEPARTMENT ORDERS, AND DIRECTIVES. BEING A MEMBER OF THE COOK COUNTY JAIL ADMINISTRATIVE DISCIPLINARY HEARING COMMITTEE/BOARD; THEY OWE PLAINTIFF A DUTY. THE DUTY TO BE HONEST, FAIR, AND IMPARTIAL WHILE ON THE DISCIPLINARY COMMITTEE/BOARD OR, AS A SWORN IN OFFICER BY STATE LAW TORTS.

44.) NO MEMBER EVER CALLED/INVESTIGATED MY WITNESSES; FOR AND/OR AGAINST PLAINTIFF. THEIR (WAS NOT) ANY FACT FINDING; IN THE GUILTY VERDICT. NONE OF THE DISCIPLINARY REPORT(S); WAS VALID. HOWEVER, WHEN THE PLAINTIFF, POINTED THIS OUT THEY REFUSED/FAILURE TO CORRECT THE INFRACTIONS(S) OF THE TICKET(S); DISCIPLINARY REPORT(S). THE (7) DAY EXPIRATION DATE AND THE (24) HOUR TO SERVE THE TICKET WAS EXPIRED. HOWEVER, THE DISCIPLINARY COMMITTEE; IGNORED THIS VERY SERIOUS VIOLATION(S), OF THEIR OWN POLICY THAT CLEARLY STATES THAT; THE HEARING MUST BE HELD WITHIN (7) DAYS OF THE DELIVERY OF DISCIPLINARY REPORT. AND SHALL BE DELIVERED IN (24) HOURS.

## DUE PROCESS CLAUSE CLAIMS:

- 45.) SOME DISCIPLINARY HEARINGS; THE PLAINTIFF (WAS NOT) GIVEN (48) HOURS TO PREPARE FOR THE ADMINISTRATIVE DISCIPLINARY HEARING BOARD. NO DISCIPLINARY COORDINATOR TO INVESTIGATE, DELIVER THE DISCIPLINARY REPORT (DR) AND ASK THE SUSPECT WOULD HE LIKE TO QUESTION THE WITNESSES; BY WAY OF QUESTIONAIRE. AND VISIT THE CRIME, INCIDENT, EVENT; WAS COMMITTED AND/OR TAKEN PLACE. AND TO GATHER PHOTO'S; WITNESSES; FOR AND/OR AGAINST PLAINTIFF, BY MATERIAL, EVIDENCE, AND FACT FINDING.
- 46.) WHAT IF AD...SON WAS ILLITERATE, AND/OR CANNOT UNDERSTAND THE DISCIPLINARY PROCEDURE. HE SHOULD BE ASKED IF HE CAN UNDERSTAND THE PROCEDURE. IF HE/SHE DOES NOT AWARD HE A COOK COUNTY DEPARTMENT OF CORRECTION (STAFF ASSISTANCE) IF THEY THEMSELVES, IS FAMILIAR WITH THE DISCIPLINARY SYSTEM). THEIR (WAS NOT) A COPIED DISCIPLINARY PROCEDURE GIVEN TO THE PLAINTIFF, FROM A DISCIPLINARY COORDINATOR NOR ADMINISTRATIVE HEARING BOARD). THE ONE POSTED ON THE WALL; IS OUT DATED AND THEY DO NOT FOLLOW IT AT ALL.
- 47.) THE PROCEDURE IS DISHONEST. WHEN A OFFICER(S); DELIVER THE DISCIPLINARY REPORT (DR) HE ALREADY STATES IN WRITING THAT, 'YOU REFUSE'. WHEN AND WHEN NOT YOU RECEIVE THE REPORT. THIS IS WHERE THERE SHOULD BE A DISCIPLINARY COORDINATOR, TO ASURE THERE WILL BE AN INTERVIEW/INVESTIGATION FOR MAJORS.

## JUEPROCESS CLAUSE CLAIMS:

48.) THE DISCIPLINARY ADMINISTRATIVE HEARING BOARD; STATES THEIR OPINION NOT FACT WHEN DECIDING THE VERDICT OF GUILTY. THEIR ONLY BASING THEIR PERSONAL OPINION NOT FACTS BY THE PREPONDERANCE OF EVIDENCE AND THE ENTIRE FACTOR THAT IT IS MOST LIKELY THAN NOT, THAT, THE DETAINEE(S); IS GUILTY THAN NOT GUILTY. ALL THE PLAINTIFFS; GUILTY VERDICTS, WAS NEVER, EVER EXPLAINED. THAT; THE DISCIPLINARY ADMINISTRATIVE HEARING DECISIONS IS ONLY PREJUDICE. THE DECISION IS ONE SIDED. THIS CONSTITUTE'S DISCRIMINATION AGAINST PLAINTIFF BECAUSE HE'S A DETAINEE, AND CONSTITUTES A VIOLATION OF MR. PAUL JARNELL TAYLOR 14th AMENDMENT DISCRIMINATION TO THE UNITED STATES CONSTITUTION TO THE UNITED STATE CONSTITUTION OF AMERICA.

49.) THE DISCIPLINARY REPORT SECTION II STATE THAT THE HEARING SHALL BE HELD WITHIN (72) HOURS OF THE DELIVERY. HOWEVER; WHEN THE PLAINTIFF MENTION THIS AT THE HEARING THE COMMITTEE MR. CIVILIAN; MRS. CIVILIAN; SGT. UNKNOWN AND THE OTHERS ON DIFFERANT TIMES, MRS. SGT. UNKNOWN; LT. UNKNOWN; MRS. OFFICER SHERIFF, MR. SHERIFF; REFUSED TO CORRECT THIS SERIOUS CONSTITUTIONAL RIGHT VIOLATION. THIS CONSTITUTES A VIOLATION OF MR. PAUL JARNELL TAYLOR; 14th AMENDMENT JUEPROCESS CLAUSE TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.



## DUE PROCESS CLAUSE CLAIMS:

50.) THE PLAINTIFF, NEVER RECEIVED DUE NOTICE OF THE INITIAL PLACEMENT ON REPORT. AND THE RIGHT TO CALL HIS WITNESSES; BY AND THROUGH A DISCIPLINARY COORDINATOR; BEFORE THE DISCIPLINARY ADMINISTRATIVE HEARING BOARD, HEARD THE PLAINTIFF DISCIPLINARY REPORT (D.R.) THE PLAINTIFF WAS TOLD THAT, HE HAD TO WRITE THE WITNESSES DOWN ON A PIECE OF PAPER. ONCE THE PLAINTIFF, DID SO THEY RENDER A (GUILTY VERDICT); WITH NO ATTEMPT TO GATHER, CALL, HIS WITNESSES. THIS CONSTITUTES A FAILURE TO GIVE PLAINTIFF, A RIGHT TO (DUE NOTICE) TO CALL, AND PREPARE A QUESTIONNAIRE FOR THE DISCIPLINARY COORDINATOR, AND FOR THE DISCIPLINARY ADMINISTRATIVE HEARING BOARD. AND A VIOLATION OF MR. PAUL D. TAYLOR'S CONSTITUTIONAL RIGHTS BY THE 14th AMENDMENT DUE PROCESS CLAUSE TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

51.) DISCLOSURE/ DISCOVERY: DEFENDANT(S); NEVER SHOW THE PLAINTIFF A CLEAR PICTURE BY COLOR, OF THE HOME KNIFE, THAT, WAS SUPPOSE TO BE IN THE CELL. THE PICTURE, WAS BLACK AND WHITE, THE PICTURE, WAS NOT LIABLE. THE SAME PICTURE THAT, WAS SHOWN AT THE DISCIPLINARY ADMINISTRATIVE HEARING BOARD; WAS USED FOR ALL INMATES, THAT HAD THE SAME TICKETS. THE PLAINTIFF, WAS DENIED OTHER DISCOVERY FOR HIS APPEAL SUCH AS THE WRITTEN REPORTS; INCIDENT/ INFORMATION REPORTS (I.R.'s) THIS CONSTITUTES A VIOLATION OF DUE PROCESS CLAUSE BY THE 14th AMENDMENT TO THE UNITED STATES CONSTITUTION OF AMERICA

## DUE PROCESS Clause Claims:

52.) THAT; THE PLAINTIFF WAS DENIED DUE NOTICE (POSTED) NOTICE OF THE RULES & REGULATIONS BY, FOR, THE DEPARTMENT. THE CHICAGO COOK COUNTY DEPARTMENT OF CORRECTIONS DOES NOT HAVE A ORIENTATION FOR DETAINEES. THERE IS NOT A SIGNING PROCEDURE FOR PROOF OF SERVICE OF THE ORIENTATION RULES OF THE DEPARTMENT. THEREFORE THE PLAINTIFF HAS NO KNOWLEDGE OF THE VIOLATIONS, OF DEPARTMENT ORDERS, DIRECTIVE, POLICIES, RULES & REGULATIONS. THIS CONSTITUTES A VIOLATION OF (DUE NOTICE) BY THE 14th AMENDMENT TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA. (CLAIM STATE).

53.) ON OCTOBER 18th, 2007: PLAINTIFF WAS MOVED FROM DIVISION II TO DIVISION X FOR THE USE OF MENTAL HEALTH-PSYCHIATRY MEDICATION. HOWEVER; THERE WAS ONLY ONE POI FOR THIS. THERE WAS NOT MEDICATION FOR ME, AND THEIR NO REASON FOR PLACING PLAINTIFF IN A VERY DANGEROUS SITUATION. DIVISION X IS MURDER, ATTEMPT MURDER; ASSAULT, AGGRAVATED ASSAULT, THE PLAINTIFF HAS RESIDENTIAL BURGLARY. NO CHARGES OF VIOLENCE. DIVISION X IS LOCKED DOWN EIGHTEEN (18) HOURS A DAY. THE PLAINTIFF WAS IN MINIMUM SECURITY THAN PLACED IN MAX. THE CHICAGO COOK COUNTY DEPARTMENT OF CORRECTIONS DOES NOT HAVE A CLASSIFICATION PROGRAM. THE MENTAL HEALTH IS DIVISION VIII #8. ALWAYS HAS BEEN. THE DETAINEES, THAT TAKE / TOOK PSYCHOTROPIC PSYCH-MEDICATION, SOME MOVED TO DIVISION X; HOWEVER; THE



## DUE PROCESS CLAUSE CLAIMS:

54.) - PLAINTIFF REFUSED THEIR MEDICATION, BUT THEY REFUSED TO MOVE PLAINTIFF BACK WHERE HE CAME FROM, THAT IS DIVISION II. DEFENDANTS PLACIO; MOVED PLAINTIFF TO DIVISION IX. DEFENDANTS ANDREW MOVED PLAINTIFF FROM DIVISION IX TO DIVISION VI WHERE HE'S NOW SLEEPING ON THE FLOOR, FROM OVERCROWDING. THIS CONSTITUTES A FAILURE TO CLASSIFY DETAINEE CORRECTLY CAUSING HIM THE (PSYCHOLOGICAL ABUSE) BEING IN A TWO MAN CELL WITH TWO OTHER CELL MATES. THIS CONSTITUTES A VIOLATION OF MR. TAYLOR'S DUE PROCESS CLAUSE BY THE 14th AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

55.) RETALIATION BY DEFENDANTS ANDREW. BECAUSE THE PLAINTIFF REFUSED THEIR MEDICATION, DEFENDANT ANDREW PROMISE THE PLAINTIFF THAT HE WILL GET EVEN. STATING "WANT GO BACK TO DIVISION II." ANYWHERE BUT DIVISION II. SO DEFENDANTS - ANDREW; MOVED PLAINTIFF TO THE WORST DIVISION THERE IS. AND THAT IS DIVISION VI WHERE HE KNOW THERE'S THREE (3) IN A CELL. THIS CONSTITUTES: RETALIATION; A VIOLATION OF MR. PAUL D. TAYLOR; (FUNDAMENTAL FAIRNESS) BY THE DUE PROCESS CLAUSE TO THE 14th AMENDMENT RIGHTS TO THE UNITED STATE CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA. (DUE PROCESS CLAIM STATED) ALL DEFENDANTS ACT "DELIBERATE INDIFFERENCE."

# DUE PROCESS CLAIMS:

## IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

- 56.) DEFENDANT MARTINEZ; REFUSED TO PROCESS TWO OF PLAINTIFF; INMATE GRIEVANCE. SOME WAS ALLEGING ALLEGATIONS OF ABUSE; ASSAULTS; (REFUSED MEDICAL TREATMENT) THIS CONSTITUTES A VIOLATION OF MR. PAUL DARNELL TAYLOR'S (FIRST) 1ST AMENDMENT CONSTITUTIONAL RIGHT TO GRIEVANCE A WRONG, ... TO THE UNITED STATES CONSTITUTION OF AMERICA.
- 57.) DEFENDANT(S); LUCKETT; REFUSED TO PROCESS A GRIEVANCE; VERY IMPORTANT GRIEVANCE; THIS CONSTITUTES A VIOLATION OF MR. PAUL DARNELL TAYLOR, (FIRST) 1ST AMENDMENT CONSTITUTIONAL RIGHTS TO GRIEVANCE A WRONG; BY THE (FIRST) 1ST AMENDMENT CONSTITUTION TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES OF AMERICA.
- 58.) DEFENDANT UNKNOWN NURSE; REFUSED PLAINTIFF ANY MEDICAL ATTENTION, TREATMENT AFTER SHE WITNESS SERGEANT GREENE REPEATEDLY SLAP; PUNCHED; THE PLAINTIFF THIS CONSTITUTES A DUE PROCESS CLAIM

- BY (THE FIFTH AND FOURTEENTH) 5th & 14th AMENDMENT  
TO THE UNITED STATES CONSTITUTION TO THE UNITED  
STATES CONSTITUTION OF AMERICA. 1

59.) DEFENDANT(S) SALAZAR; REFUSED TO PROVIDE THE  
PLAINTIFF WITH HOT WATER; FOR SHOWERS; IN THE  
ENTIRE WINTER NOVEMBER <sup>2006</sup> THROUGH APPROXIMATELY  
JANUARY 2007; THE PLAINTIFF WAS FORCED BY RULES  
FOR DIVISION VIII TO TAKE A SHOWER EVERY SINGLE  
DAY. THIS CONSTITUTES A VIOLATION OF DUE PROCESS  
- CLAUSE BY THE FOURTEENTH 14th  
AMENDMENT CONSTITUTIONAL RIGHTS TO THE UNITED STATES  
TO THE UNITED STATES CONSTITUTION OF AMERICA.

(4-J)

60.) DEFENDANT(S) CAPTIAN FRANCO; ORDERED A SEARCH OF  
PLAINTIFF CELL WHILE HE WAS ORDERED IN THE RECREATIONAL YD.  
PLAINTIFF CANNOT WHICH THE SEARCH. PLAINTIFF PROPERTY  
SHOE(S); ETC. WAS DESTROYED. THIS CONSTITUTES A VIOLATION  
OF MR. PAUL D. TAYLOR; 4th AMENDMENT SEARCH AND SEIZURE  
OF PROPERTY WITHOUT PROBABLE CAUSE VIOLATION TO THE UNITED  
- STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION  
OF AMERICA. PLAINTIFF NEVER RECEIVE ANY RESTITUTION  
FOR HIS PROPERTY AND/OR RECOVER ANY OF IT !!!

# 6) V. RELIEF DEMAND: PLAINTIFF DEMAND THE FOLLOWING?

ISSUE A) PLAINTIFF REQUEST THAT; THE HONORABLE COURT WHEREFORE GRANT: ALL RIGHTS RESTORED BACK TO THE PLAINTIFF BY WAY OF DELATORY RELIEF: BY EXEMPTING; EXPOSING; THE DISCIPLINARY REPORTS, RECORDS OF GUILTY VERDICTS, AND GRANT COMPENSATORY DAMAGES; FOR ALL DAY THE PLAINTIFF SPENT IN PUNITIVE SEGREGATION; AND THE PSYCHOLOGICAL ABUSE; MENTAL TORMENTS; BEING LOCKED DOWN FOR NO REASON. "DECLATORY JUDGMENT": GRANTING A NEW POLICY FOR INMATES/ JETAINEES APPEAL SYSTEM; THAT THERE BE (THREE PAGE FORMS) STATING CAUTION APPEAL, AND THE FORMAT BE (DUE PROCESS REQUIREMENT) (BURDEN OF PROOF) AND (THE SEVERALTY OF PENALTY) THAT THERE SHOULD AND SHALL BE A DISCIPLINARY COORDINATOR, CONDUCT ALL MINOR DISCIPLINARY VIOLATION, AND INVESTIGATE ALL MAJOR DISCIPLINARY VIOLATIONS, BY RETRIEVING ANY VERBAL / WRITTEN STATEMENTS BY THE JETAINEE, AND / SHE WITNESSES). AND BE GIVEN (48) HOURS TO PREPARE FOR THE HEARING, AND A STAFF MEMBER WORKING FOR THE (OUTSIDE) ASSIST THE JETAINEES BY A WAY OF (STAFF ASSISTANCE TO THE ILLITERATE). GRANT, PUNITIVE DAMAGES, FOR THE WILFUL MISCONDUCT OF THE DEFENDANTS ON THE FIRST AMENDMENT CONSTITUTIONAL RIGHTS VIOLATION / DUE PROCESS CLAUSE THE PLAINTIFF WAS INJURED PHYSICALLY, MENTALLY, BY SHOCK; TRAUMA; HUMILIATION, EMBARRASSMENT; MENTAL ANGUISH; THE VIOLATION OF MR. PAUL TAYLOR FIFTH & FOURTEEN AMENDMENT DUE PROCESS CLAUSE TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.

9) ISSUE B. THE PLAINTIFF DEMANDS THAT THE DECLATORY JUDGMENT:

VI (62)

INCLUDE ALL PARTIES/DEFENDANTS BY EXEMPT/EXONORATE FROM THEIR DUTIES. AND AWARD PLAINTIFF COMPENSATORY/PUNITIVE DAMAGES FOR AROUND ONE MILLION DOLLARS / 1,000,000 DOLLARS.

63 VI. THE PLAINTIFF DEMANDS THAT THE CASE BE TRIED BY JURY:

### CERTIFICATION : OF SERVICE

By signing this Complaint, I CERTIFY THAT THE FACTS STATED IN THIS COMPLAINT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF. I UNDERSTAND THAT IF THIS CERTIFICATION IS NOT CORRECT, I MAY BE SUBJECT TO SANCTIONS BY THE COURT.

RESPECTFULLY SUBMITTED THIS 29<sup>th</sup> DAY OF NOVEMBER, YEAR: 2007.

By PAUL JARNELL TAYLOR

*Paul Jarnell Taylor*  
P.O. Box 089002  
Chicago, IL 60608

ONE AND TWO COPIES TO THE CLERK, OF THE HONORABLE COURT  
219 So. Dearborn St,  
Chicago, Illinois 60604

THE UNITED STATES DISTRICT COURT HOUSE

FOR THE DISTRICT OF COV, ILLINOIS:

PLAINTIFF, HAS EXCESSIVE AMOUNT OF DEFENDANTS PLEASE EXCEPT THE ADDITIONAL PAGES BY FEDERAL RULES?

(6-A)

44) v. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

THE PLAINTIFF DEMANDS: IS THAT ALL DEFENDANTS;  
BE RESTRAINED FROM THEIR PREJUDICIAL DECISIONS ON THE  
PLAINTIFF DISCIPLINARY ADMINISTRATIVE HEARINGS. THE  
PLAINTIFF REQUEST THIS HONORABLE COURT TO ASSIST PLAINTIFF  
IN RESTRUCTURING A NEW AND APPROVE DISCIPLINARY  
SYSTEM AND/OR POLICY, PROCEDURES(S).

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

#### CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 29th day of November 07

PAUL JARNAL TAYLOR #2006-0080893  
(Signature of plaintiff or plaintiffs)

PAUL JARNAL TAYLOR 2006-0080893  
(Print name)

2006-0080893  
(I.D. Number)

P.O. BOX 089008  
CHICAGO, ILLINOIS 60608  
COOK COUNTY JAIL.  
(Address)

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PLAINTIFF(S) Vs. DEFENDANT(S) :

- 65) THAT; ALL DEFENDANT(S) IS BEING SUE IN THEIR INDIVIDUAL & OFFICAL CAPACITY AND IS IN ONE WAY OR ANOTHER IN VIOLATION OF MR. PAUL TAYLOR, FIRST (1ST) - FOURTH (4th) & FIFTH (5th) - FOURTEENTH 14th AMENMENT CONSTITUTIONAL RIGHT(S) TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA.
- 66) THE PLAINTIFF REQUEST PERMISSION TO SUE UNDER 42 U.S.C.A 1983 CIVIL ACTION LITIGATION AND BY THE JURISDICTION TITLE 28 SECTION 1331 U.S. CODE.
- 67) THAT THE PLAINTIFF WILL ILLUSTRATE A CLAIM THAT RELIEF CAN BE DEMAND. AND THAT THE PLAINTIFF PAUL JARNELL TAYLOR #2006-0080893 JULY SWARE DEPOSE AND SAYS THAT THAT HE CAN & WILL PROVE BY THE PROPOUNDENCE OF ALL EVIDENCE THAT; THE DEFENDANT(S) ALL WILFULLY & PURPOSEFULLY VIOLATED MR. PAUL J. TAYLOR, CONSTITUTIONAL RIGHTS TO THE UNITED STATES CONSTITUTION TO THE UNITED STATES CONSTITUTION OF AMERICA. UNDER THE PENALTY OF PERJURY 28 U.S.C.A. 1746 SO HELP ME GOD.

Paul J. Taylor #2006-0080893